

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

★ DEC 9 0 2011 ★

JANE BEST-SIMPSON *et al.*,

Plaintiffs,

-against-

ROBERT GOSSEEN *et al.*,

Defendants.

BROOKLYN OFFICE

NOTICE OF REMOVAL

Civil Action No.

CV 11 - 6001

KUNTZ, J.

**TO: THE HONORABLE JUDGES OF THE UNITED STATES DISTRICT
COURT FOR THE EASTERN DISTRICT OF NEW YORK**

PLEASE TAKE NOTICE that an action pending in the Supreme Court of the

REYES, M.J

State of New York, Kings County, is hereby removed to the United States District Court for the
Eastern District of New York.

Loretta E. Lynch, United States Attorney for the Eastern District of New York, by
Ameet B. Kabrawala, Assistant United States Attorney, of counsel, respectfully states the
following facts upon information and belief:

1. The above-captioned action was commenced in the Supreme Court of the
State of New York, Kings County, Index No. 4549/2011, and names as defendants United States
District Judge Barbara S. Jones and United States Magistrate Judge Andrew J. Peck in their
official and individual capacities (collectively, the "Federal Defendants"). A true and correct
copy of the Verified Complaint, filed on June 24, 2011, and the Amended Summons, filed on
June 24, 2011, are collectively attached hereto as Exhibit A.

2. The Verified Complaint purports to allege various claims against the
Federal Defendants, including claims of negligence and civil rights violations.

3. Defendant Jones is, and at all times relevant hereto was, a United States District Judge in and for the Southern District of New York.

4. Defendant Peck is, and at all times relevant hereto was, a United States Magistrate Judge in and for the Southern District of New York.

5. Upon information and belief, the source of which is correspondence received from Judge Jones and Magistrate Judge Peck, all alleged acts or omissions relevant to plaintiff's Verified Complaint were taken in the context of civil litigation over which Judge Jones and Magistrate Judge Peck presided in the course and scope of their employment as officers of the courts of the United States.

6. This action may be removed to this Court pursuant to 28 U.S.C. §§ 1441(a), 1442(a)(3) and 2679(d) because the Federal Defendants, who are sued in their official and individual capacities for acts that allegedly occurred under color of their respective federal offices, are officers of the courts of the United States.

7. Pursuant to 28 U.S.C. § 2408, the United States may remove this action without a bond.

8. The submission of this notice of removal is solely for the purpose of removing this action to the appropriate federal court and is not a general appearance by the Federal Defendants. This submission does not constitute a waiver of any defense available to the Federal Defendants, including any defense under Rule 12 of the Federal Rules of Civil Procedure.

WHEREFORE, it is respectfully requested that the above-captioned action now pending in the Supreme Court of the State of New York, Kings County, Index No. 4549/2011, be removed to this Court; and

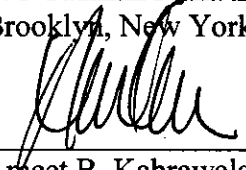
In accordance with 28 U.S.C. § 1446(d), the filing of a copy of this notice with the Supreme Court of the State of New York, Kings County, shall effect the removal, and the state court shall proceed no further with respect to the action, unless and until the case is remanded thereto.

Dated: Brooklyn, New York
December 9, 2011

Respectfully submitted,

LORETTA E. LYNCH
United States Attorney
Eastern District of New York
271 Cadman Plaza East
Brooklyn, New York 11201

By:


Armeet B. Kabrawala
Assistant U.S. Attorney
(718) 254-6001

TO: By Hand Delivery
Clerk of Court
Supreme Court of the State of New York
County of Kings
360 Adams Street
Brooklyn, New York 11201

By First-Class Mail
Jane Best-Simpson
430 Clinton Ave., #6D
Brooklyn, New York 11238
(347) 267-1244

Dr. Leon Scrimmager
210 East 86th St.
New York, New York 10028

Dr. Craig Polite
155 East 29th St., 27th Floor
New York, New York 10016

GALLAGHER GOSSEN FALLER
1050 Franklin Ave., Suite 400
Garden City, New York 11530

COHEN HURKIN EHRENFELD TANNEBAUM AND POMERANTZ LLP
25 Chapel St.
Brooklyn, New York 11201
Attorneys for Marc Crawford Leavitt, 430 Clinton Avenue Associates and Allen Tannenbaum

CORPORATION COUNSEL OF THE CITY OF NEW YORK
100 Church St.
New York, NY 10007
Attorney for Mayor Michael Bloomberg, Patricia Gatlin, New York City Police Commissioner Raymond Kelly, New York City Police Department, New York City Commission on Human Rights, Raymond Wayne, Lanny Alexander, Cliff Mulqueen, and Avery Melhman

Pstashnik & Associates
67 Wall St.
New York, New York 10005

Wilson, Elser Moskowitz & Elderman
150 East 42nd St.
New York, New York 10017

Law Office of Charles Siegal
40 Wall St., 5th Floor
New York, New York 10005

Long Island College Hospital
Legal Department
97 Amity Pl.
Brooklyn, New York 11201
Attn: Drs. Wolf, Kohl, Gerges, Barzelay

Cobble Hill Health Center
380 Henry Street
Brooklyn, New York 11201

Empire State Building Management
WH Properties
60 East 42nd St.
New York, New York 10017

WH Properties
350 Fifth Ave.
New York, New York 10001

Antoinette Gardnier
WH Properties
60 East 42nd St.
New York, New York 10017

Don Knutella
WH Properties
60 East 42nd St.
New York, New York 10017

GALLAGHER, GOSSEN FALLER
1050 Franklin Ave., Suite 400
Garden City, New York 11530

*Attorneys for Martin Wolf, New York Organ Donor Network, Elaine Berg, Julia Rivera,
and Michelle Clayton*

Brooklyn Hospital
121 Dekalb Ave.
Brooklyn, New York 11205
Attn: Dr. Morgan

EXHIBIT A

Supreme Court of the State of New York

County of Kings

Index # 4549/2011

-----X
Jane Best-Simpson and Jane Best-Simpson as the Administratrix
of the Estate of Coretta, and as the Legally appointed Guardian
of Person and Property of Melody Best

-against-

Verified Complaint

Robert Gosseen, Individual and in his professional capacity,
Law firm of Gallagher, Gosseen & Faller, New York Organ Donor Network,
Elaine Berg, Individually and Professionally, Michelle Clayton Ind. & Prof.
Julia Rivera Ind. and Professionally, Martin Wolf, individually and Professionally,
Michael Bloomberg, Mayor of the City of New York, Individually and in
his professional Capacity, City of NY, Raymond Wayne, Individually and in his
professional Capacity, New York City Commission on Human Rights,
Patricia Gatlin Individually and in his professional Capacity, Lanny Alexander
Individually and in his professional Capacity, Cliff Mulqueen, Individually and
in his professional Capacity, Dr. Craig Polite, New York State Worker Compensation
Dr. Leon Scrimmager, Cohen Hurkin & Ehrenfeld, Pomerantz and Tannebaum,
Wilson, Elsler & Moskowitz & Elderman, Law Offices of Charles Siegel, Andrew Peck, Indiv & Prof. Capacity
Long Island College Hospital, Cobble Hill Nursing Health Center, Craig Rosenbaum attorney,
Dr. Lawrence Wolf, Dr. Lewis Kohl, Dr. Sahwa Gerges, Dr. Linda Barzelay, Dr. Christine Kimble
Dr. Calvin Adderley, Marc Crawford Leavitt, Barbara Jones Indiv & Prof Capacity
Joseph Levine, Individually and in his professional capacity, Robert Cypher, Lauara Jacobson, Brooklyn Hospital;
Individually and In their Professional Capacity, Dov Sternberg, NYS Unified Court System --
Brooklyn Supreme Court Kings County or New York State & Clerk's Office Jane and John Doe, Dr. A. Morgan
City of New York Corporation Counsel, Avery Mehlman Individual and in his professional capacity,
Ptashnik & Associates, Robert Ehrenfeld and Associates, Individual and Professional Capacity, 430 Clinton Avenue
& Associates Empire State Building- WH Properties, Don Knutella, Indiv & Professional Capacity;
New York City Police Department, Raymond Kelly Commissioner, Antionette Gardnier individual & Prof. Capacity,
Eleanora Ofshtein, Individual and Professional Capacity, "X" Contracted Company of the Empire State Building- WH Properties
John or Jane Doe of the Clerk of the Civil Court of the State of New York- Kings County, Dr. Maria Sindos

RECEIVED
KINGS COUNTY CLERK
2011 JUN 24 PM 1:40

Jane Best-Simpson and Jane Best-Simpson as the Administratrix of the Estate of Coretta and the Legal Guardian of the Person and Property of Melody Best, being duly sworn, deposes and Says: that

She submits this verified Complaint against the above defendants and does hereby mak the following allegations:

1. All Defendants named herein in this Complaint place of businesses primary offices are located and operated within New York State
2. It is alleged that the defendants named in the Complaint Conspired violate the Civil Rights of the Plaintiffs.
3. It is alleged that the defendants did violate the fair debt collection Practices Act.
4. It is alleged that the defendants did violate plaintiffs HIPPA.
5. It is alleged that the defendants did commit fraud.
6. It is alleged that the defendants did violate various federal Civil Rights Statues.
7. It is alleged that the defendants did violate Various Civil Rights Employment Statues.
8. It is alleged that the defendants did commit negligence
9. It is alleged that the defendants did violate commit medical malpractice
10. It is alleged that the defendants did violate legal malpractice
11. It is alleged that the defendants did violate the RICO ACT
12. It is alleged that the defendants did violate malicious prosecution
13. It is alleged that the defendants did violate wrongful interference in business relationships
14. It is alleged that the defendants did violate breach of contract
15. It is alleged that the defendants commit slander
16. It is alleged that the defendants did commit invasion of privacy
17. It is alleged that the defendants did violate gross negligence
18. It is alleged that the defendants did Commit Intentional infliction of emotional distress
19. It is alleged that the defendants did violate negligent supervision of an employee
20. It is alleged that the defendants did violate wrongful interference in health matter
21. It is alleged that the defendants did violate wrongful interference in employment matters
22. It is alleged that the defendants did violate breach of fiduciary responsibilities
23. It is alleged that the defendants did violate wrongful termination
24. It is alleged that the defendants did violate failure of duty to protect
25. It is alleged that the defendants did violate New York City and State Human Rights Laws
26. It is alleged that the defendants did deprive the plaintiffs of their property interest in violation of their Civil Rights
27. It is alleged that the defendants did wrongfully interfere in legal relationship
28. It is alleged that the defendants did violate the NYS Wrongful death statue
29. It is alleged that the defendants did violate malicious prosecution
30. It is alleged that the defendants did violate the American Disability Act

31. It is alleged that the defendants in all of the Acts listed in this complaint, did conspire with other name defendants to violate all of the individual acts listed
32. It is alleged that the defendants did violate Unjust Enrichment
33. It is alleged that the defendants did violate negligent supervision & hiring of employee
34. It is alleged that the defendants did violate Making Terrorist threats
35. It is alleged that the defendants did violate assault & battery
36. It is alleged that the defendants did vandalism & Theft & burglary
37. It is alleged that the defendants did violate various City, State Federal Civil Statutes
38. It is alleged that the defendants did violate various federal, State and City Criminal Statutes
39. It is alleged that the defendants did violate residential rent overcharge
40. It is alleged that the defendants did violate Code of Professional Ethics of New York State Bar Association
41. It is alleged that the defendants did commit false imprisonment

Very truly yours,

Jane Best-Simpson

430 Clinton Avenue 6D

Brooklyn, New York 11238

(347) 267-1244

TO:

Defendant's Addresses:

Dr. Leon Scrimmager: 210 East 86th Street, New York, New York 10028

Dr. Craig Polite: 155 East 29th Street 27th Floor, New York, New York 10016

Gallagher, Gosseen Faller 1050 Franklin Avenue- Suite 400 Garden City, New York NY 11530 - 350 5th Avenue, NY, NY

Robert Gosseen- 1050 Franklin Avenue- Suite 400 Garden City, New York NY 11530

Cohen, Hurkin, Ehrenfeld, Tannebaum and Pomerantz LLP - 25 Chapel Street, Brooklyn, New York 11201

Pstashnik & Associates- 67 Wall Street, New York, New York 10005

Wilson, Elser & Moskowitz & Elderman 150 East 42nd Street, New York New York 10017

Law Office of Charles Siegal - 40 Wall Street, New York, New York 10005 - 5th Floor

Long Island College Hospital, Dr. Wolf, Dr. Kohl, Dr. Gerges, Dr. Barzelay - 97 Amity Place Brooklyn, New York 11201

Cobble Hill Health Center - 380 Henry Street, Brooklyn, New York 11201

City of New York, New York City Police Department, New York City Commission on Human Rights,

Mayor Micheal Bloomberg, Patricia Gatlin, Ramond Kelly, Raymond Wayne, Lanny Alexander

Cliff Mulqueen, Avery Melhman, Corporation Counsel of the City of New York:

c/o Corporation Counsel of the City of New York: 100 Church Street, New York NY 10007

Empire State Building- WH Properties, Antoinette Gardnier, Don Knutella "X" Security Company of the Empire State Building:

350 Fifth Avenue, New York, New York

Marc Crawford Leavitt, 430 Clinton Avenue Associates : c/o: Cohen, Hurkin, Ehrenfeld, Tannebaum and Pomerantz LLP – 25 Chapel Street, Brooklyn, New York 11201

Martin Wolf, New York Organ Donor Network, Elaine Berg, Julia Rivera, Michelle Clayton Lucas: c/o Gallagher, Gosseen Faller 1050 Franklin Avenue- Suite 400 Garden City, New York NY 11530 / 350 5th Avenue NY, NY

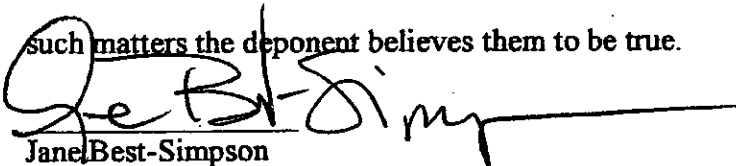
Barbara Jones and Andrew Peck and Clerk "X" of the United States District Court – Southern District – United States District Court – Southern District of New York US Court House – 500 Pearl Street, New York, New York 10007

Dr. Morgan & Brooklyn Hospital – 121 Dekalb Avenue, Brooklyn, New York 11205


State of New York

County of Kings

The Undersigned Jane Best-Simpson, the Plaintiff, having appeared PRO-SE in this matter, being duly sworn deposes and says: that she has read the foregoing Verified Complaint, and that the contents of the said Verified Complaint are true to the Deponent's own knowledge, except as to those matters which are alleged upon information and belief, and as to such matters the deponent believes them to be true.


Jane Best-Simpson

Sworn before me this 23rd day of June 2011
Notary Signature and Seal


KAMAL P. SONI
Notary Public, State of New York
No. 01SO6089949
Qualified in Kings County
Commission Expires March 31, 2015

Supreme Court of the State of New York
County of Kings

Jane Best-Simpson and Jane Best-Simpson as the
Administratrix of the Estate of Coretta Best and as the legally
Appointed Guardian of the Person and Property of Melody Best

Plaintiff(s)

against

Robert Gosseen, Individual and in his Professional Capacity,
and firm of Gallagher, Gosseen and Feller, New York Organ Donor Network
Elaine Berg, Individually, Michele Clayton, Individually, Julia Rivera
Indiv & Prof, Martin Wolf Indiv & Prof, Michael Bloomberg, Mayor of City of
New York, Indiv & Prof Capacity, New York City Commission on Human Rights, Patricia Gatten
Indiv & Prof Capacity, Raymond Wayne, Indiv & Prof Cap, Larry Alexander, Indiv & Prof
Capacity, Cliff Mulqueen, Indiv & Professional Capacity, Dr. Craig Polite,
Dr. Leon Sarminger, Cohen, Hurkin, Ehrenfeld, Wilson, Gistler, Moskowitz &
Elderman, Esq, Manhattan Community College, Manhattan Community College
Long Island College Hospital, Cobble Hill Nursing Health Center, Craig Rosenbaum
Dr. Wolfe, Dr. Kahn, Dr. Gerdes, Dr. Barzelay, Dr. Calvin Adams
Marc Crawford Leavitt, Joseph Levine, Indiv & Professional, Robert E. Feller, Jr.
Laura Jacobson, Indiv & Professional, New York City Department of Human Resources
David G. Stern, New York State Unified Court System, City of New York, City of New York
Robert Ehrenfeld, Indiv & Professional Capacity

Defendant(s)

KINGS COUNTY CLERK
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2011 FEB 25 PM 4:21
Date purchased

4549/11

Plaintiff(s) designate(s)
Kings County
County as the place of trial.

The basis of the venue is
Plaintiff Residence

Summons
with Notice

Plaintiff(s) reside(s) at
430 Clinton Ave #6D
Brooklyn, New York 11238
County of
Kings

You are hereby summoned to answer the complaint in this action and to serve a copy of
your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's
Attorney(s) within 20 days after the service of this summons, exclusive of the day of service (or within 30
days after the service is complete if this summons is not personally delivered to you within the State of New
York); and in case of your failure to appear or answer judgment will be taken against you by default for the relief
demanded in the complaint.

Dated, February 25, 2011

Defendant's address: 210 East 87th Street, New York, NY 10019
155 East 29th Street, New York, NY 10016
Gallagher, Gosseen & Feller, LLP
25 Chapel St, Suite 705, Brooklyn, NY 11201
67 Wall Street, NY, NY 10005, Wilson, Eisen
150 East 42nd St, NY, NY 10017, LAW OFFICE OF
7th floor, 100057, UCH 97 Amity Place, New York, NY 11238
380 Henry Street, Brooklyn, NY 11249, Bureau of Health Services, City of New York, Department of Health and Mental Hygiene
Notice: The nature of this action is - Violation of Various Federal Civil Rights Statutes, Violation of RICO Act, Breach of Contract, Infringement of
State and Federal Rights, Violation of HIPAA, Violation of Fair Debt Collection Practices Act, Wrong Interference in Employment, Invasion of Privacy,
Unjust Enrichment, Violation of Fair Debt Collection Practices Act, Wrong Interference in Employment, Invasion of Privacy,
Business, Legal Relationships, Breach of Contract, wrongful termination, etc. Deposition of Property Life Liberty a threat of
conspiracy to violate all of the above listed above as well, etc. Deposition of Property Life Liberty a threat of
The relief sought is: Reimbursement and Financial Restitution and Value Assessment, REINSTATEMENT,
All Property and Estimate Value of Property & Property Interest loss as a result of Actions of
Defendants which resulted in Loss of Income, Loss of Consortium & Services, Damages for Emotional
Compensatory/Punitive Damages, Damages for Loss of Consortium & Services, Damages for Emotional
Distress, etc. Professional Sanctions,

GEB-Simpson

Attorney(s) for Plaintiff
Jane Best-Simpson - PRO-SE
Office and Post Office Address
430 Clinton Ave #6D
Brooklyn, N.Y. 11238
(347) 267-1244

Dr. Leon Sarminger 210 East 87th Street, New York, NY 10019
Dr. Craig Polite 155 East 29th Street, New York, NY 10016
Gallagher, Gosseen & Feller, LLP
25 Chapel St, Suite 705, Brooklyn, NY 11201
67 Wall Street, NY, NY 10005, Wilson, Eisen
150 East 42nd St, NY, NY 10017, LAW OFFICE OF
7th floor, 100057, UCH 97 Amity Place, New York, NY 11238
380 Henry Street, Brooklyn, NY 11249, Bureau of Health Services, City of New York, Department of Health and Mental Hygiene
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All Property and Estimate Value of Property & Property Interest loss as a result of Actions of
Defendants which resulted in Loss of Income, Loss of Consortium & Services, Damages for Emotional
Compensatory/Punitive Damages, Damages for Loss of Consortium & Services, Damages for Emotional
Distress, etc. Professional Sanctions,

Upon your failure to appear, judgment will be taken against you by default for the sum of \$250 Millions Dollars
with interest from February 25, 2010 and the costs of this action. Two Hundred and Fifty
millions Dollars

deponent served the within summons, on defendant,

INDIVIDUAL
1 ☐ by delivering a true copy of *each* to said defendant personally; deponent knew the person so served to be the person described as said defendant therein.

2. ☐ a corporation, by delivering thereat a true copy of each to personally, deponent knew said corporation so served to be the corporation described in said summons as said defendant and knew said individual to be thereof.

SUITABLE AGE PERSON by delivering thereat a true copy of each to a person of suitable age
3. ☐ and discretion. Said premises is defendant's—actual place of business—dwelling place—usual place of abode—within the state.

4. ☐ by affixing a true copy of *each* to the door of said premises, which is defendant's—actual place of business—dwelling place—usual place of abode—within the state. Deponent was unable, with due diligence to find defendant or a person of suitable age and discretion thereat, having called there

MAILING TO
RESIDENCE
USE WITH 3 OR 4

5A. ☐

**MAILING TO
BUSINESS**
USE WITH 3 OR 4

58.

DESCRIPTION
USE WITH
1, 2, OR 3

P

Within 20 days of such delivery or affixing, deponent enclosed a copy of same in a postpaid envelope properly addressed to defendant at defendant's last known residence, at _____ and deposited _____

said envelope in an official depository under the exclusive care and custody of the U.S. Postal Service within New York State. Within 20 days of such delivery or affixing, deponent enclosed a copy of same in a first class postpaid envelope properly addressed to defendant at defendant's actual place of business, at

in an official depository under the exclusive care and custody of the U.S. Postal Service within New York State. The envelope bore the legend "Personal and Confidential" and did not indicate on the outside thereof, by return address or otherwise, that the communication was from an attorney or concerned an action against the defendant.

☐ Male ☐ White Skin ☐ Black Hair ☐ White Hair ☐ 14-20 Yrs. ☐ Under 5' ☐ Under 100 Lbs.

☐ Female ☐ Black Skin ☐ Brown Hair ☐ Balding ☐ 21-35 Yrs. ☐ 5'0"-5'3" ☐ 100-130 Lbs.

☐ ☐ Yellow Skin ☐ Blonde Hair ☐ Mustache ☐ 36-50 Yrs. ☐ 5'4"-5'8" ☐ 131-160 Lbs.

☐ ☐ Brown Skin ☐ Gray Hair ☐ Beard ☐ 51-65 Yrs. ☐ 5'9"-6'0" ☐ 161-200 Lbs.

☐ ☐ Red Skin ☐ Red Hair ☐ Glasses ☐ Over 65 Yrs. ☐ Over 6' ☐ Over 200 Lbs.

Other identifying features:

Sworn to before me on

Print name beneath signature.

LICENSE NO.

Index No.
Supreme Court of the State of New York
County of Kings

Jane Best-Simpson and Ione Best-Simpson
As the Administratrix of Estate of Corretta
Best and Jane Best Simpson as the legally
appointed Guardian of the Person & Property

Plaintiff(s)

against

Robert Gosses, Indiant Prof., Gallagher Gosses & Fuller
New York Organ Dover Network, Elaine Berg Indiant & Professor
Michael Clayton, Personal & Professor, Indiant Julia Cramer, Indiant &
Prof., Mark Wolf Indiant Prof., Margaret Michael Bloomberg Indiant Prof., at
New York City Commission on Human Rights, twice Gast Inv. Baymang Wayne
Lenny Alexander, Chief Inv. Inquiry Indiant & Professor Dr. Cray Politic
Dr. Cesar Serrano, Co-Editor of the Indiant & Professor Dr. Ganebaum
Chippewa-Lenape River Defendant(s) with Elderly, Indiant & Professor
E-t-a-l Avery McIlwain, Indiant Prof., Charles Seeger, Practitioner & Assistant
ET AL)

Summons with Notice

**ACTION NOT BASED UPON A
CONSUMER CREDIT TRANSACTION**

Attorney(s) for Plaintiff(s)
WABE BEST-SIMPS on-Ped-SE

Office. Post Office Address and Tel. No.

Don Clifton Ave. #6D

Brooklyn, NY. 11238

347-267-1244

Supreme Court of the State of New York

County of Kings

Index # 4549/2011

Jane Best-Simpson and Jane Best-Simpson as the Administratrix
of the Estate of Coretta, and as the Legally appointed Guardian
of Person and Property of Melody Best
Plaintiffs,

-against-

Robert Gosseen, Individual and in his professional capacity,
Law firm of Gallagher, Gosseen & Faller, New York Organ Donor Network,
Elaine Berg, Individually and Professionally, Michelle Clayton Ind. & Prof.
Julia Rivera Ind. and Professionally, Martin Wolf, individually and Professionally,
Michael Bloomberg, Mayor of the City of New York, Individually and in
his professional Capacity, City of NY, Raymond Wayne, Individually and in his
professional Capacity, New York City Commission on Human Rights,
Patricia Gatlin Individually and in his professional Capacity, Lanny Alexander
Individually and in his professional Capacity, Cliff Mulqueen, Individually and
in his professional Capacity, Dr. Craig Polite, New York State Worker Compensation
Dr. Leon Scrimmager, Cohen Hurkin & Ehrenfeld, Pomerantz and Tannebaum,
Wilson, Elser & Moskowitz & Elderman, Law Offices of Charles Siegel, Andrew Peck, Indiv & Prof. Capacity
Long Island College Hospital, Cobble Hill Nursing Health Center, Craig Rosenbaum attorney,
Dr. Lawrence Wolf, Dr. Lewis Kohl, Dr. Sahwa Gerges, Dr. Linda Barzelay, Dr. Christine Kimble
Dr. Calvin Adderley, Marc Crawford Leavitt, Barbara Jones Indiv & Prof Capacity
Joseph Levine, Individually and in his professional capacity, Robert Cypher, Laura Jacobson, Brooklyn Hospital;
Individually and in their Professional Capacity, Dov Sternberg, NYS Unified Court System -
Brooklyn Supreme Court Kings County or New York State & Clerk's Office Jane and John Doe, Dr. A. Morgan
City of New York Corporation Counsel, Avery Mehlman Individual and in his professional capacity,
Ptashnik & Associates, Robert Ehrenfeld and Associates, Individual and Professional Capacity, 430 Clinton Avenue
& Associates Empire State Building- WH Properties, Don Knutella, Indiv & Professional Capacity;
New York City Police Department, Raymond Kelly Commissioner, Antionette Gardnier individual & Prof. Capacity,
Eleanora Ofshtein, Individual and Professional Capacity, "X" Contracted Company of the Empire State Building-WH Properties
John or Jane Doe of the Clerk of the Civil Court of the State of New York- Kings County, Dr. Maria Sindos

Date Purchased: 2/25/11

Plaintiffs designates:

Kings County as the Place of
Trial

The basis of venue is

Plaintiff's Residence

Amended Summons

with Notice

Plaintiff(s) resides at

430 Clinton Avenue #6D

Brooklyn, New York 11238

County of Kings

FILED
KINGS COUNTY CLERK
11 JUN 24 PM 1:20

FILED
KINGS COUNTY CLERK
JUN 24 PM 1:20

To the above named Defendant(s)

You are Hereby summoned to answer the complaint in this action and to serve a copy of your answer, or if the complaint is not served with the Summons, to serve a notice of appearance, on the Plaintiff's Attorneys within 20 days after the service of the summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York; and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.



Jane Best-Simpson – PRO-SE

430 Clinton Avenue, #6D

Brooklyn, New York 11238

(347) 267-1244

Date of the Original Summons: February 25, 2011

Today's Date: June 23, 2011

Defendant's Addresses:

Dr. Leon Scrimmager: 210 East 86th Street, New York, New York 10028

Dr. Craig Polite: 155 East 29th Street 27th Floor, New York, New York 10016

Gallagher, Gosseen Faller 1050 Franklin Avenue- Suite 400 Garden City, New York NY 11530

Robert Gosseen- 1050 Franklin Avenue- Suite 400 Garden City, New York NY 11530

350 5th Avenue NY, NY

Cohen, Hurkin, Ehrenfeld, Tannebaum and Pomerantz LLP – 25 Chapel Street, Brooklyn, New York 11201

Pstashnik & Associates- 67 Wall Street, New York, New York 10005

Wilson, Elser & Moskowitz & Elderman 150 East 42nd Street, New York New York 10017

Law Office of Charles Siegal – 40 Wall Street, New York, New York 10005 – 5th Floor

Long Island College Hospital, Dr. Wolf, Dr. Kohl, Dr. Gerges, Dr. Barzelay – 97 Amity Place Brooklyn, New York 11201

Cobble Hill Health Center – 380 Henry Street, Brooklyn, New York 11201

City of New York, New York City Police Department, New York City Commission on Human Rights,

Mayor Micheal Bloomberg, Patricia Gatlin, Ramond Kelly, Raymond Wayne, Lanny Alexander

Cliff Mulqueen, Avery Melhman, Corporation Counsel of the City of New York:

c/o Corporation Counsel of the City of New York: 100 Church Street, New York NY 10007

Empire State Building- WH Properties, Antoinette Gardnier, Don Knutella "X" Security Company of the Empire State Building:

350 Fifth Avenue, New York, New York

Marc Crawford Leavitt, 430 Clinton Avenue Associates : c/o: Cohen, Hurkin, Ehrenfeld, Tannebaum and Pomerantz LLP – 25 Chapel Street, Brooklyn, New York 11201

Martin Wolf, New York Organ Donor Network, Elaine Berg, Julia Rivera, Michelle Clayton Lucas: c/o Gallagher, Gosseen Faller 1050 Franklin Avenue- Suite 400 Garden City, New York NY 11530

350 5th Avenue, NY, NY

Barbara Jones and Andrew Peck and Clerk "X" of the United States District Court – Southern District – United States District Court --Southern District of New York US Court House – 500 Pearl Street, New York, New York 10007

Dr. Morgan & Brooklyn Hospital – 121 Dekalb Avenue, Brooklyn, New York 11205

1. Notice: the Nature of this Action is
2. Violation of Civil Rights of the Plaintiffs.
3. Violation of the fair debt collection Practices Act.
4. Violation of HIPPA.
5. Violation of commit fraud.
6. Violation of various federal Civil Rights Statues.
7. Various Civil Rights Employment Statues.
8. Violation of commit negligence
9. Violation of commit medical malpractice
10. Violation of legal malpractice
11. Violation of RICO ACT
12. Violation of malicious prosecution
13. Violation of wrongful interference in business relationships
14. Violation of breach of contract
15. Violation of slander& libel
16. Violation of Invasion of privacy
17. Violation of Negligence& Gross negligence

As well as violation of all of the following acts:

18. Intentional infliction of emotional distress
19. Negligent supervision of an employee
20. Wrongful interference in health& legal matters
21. Wrongful interference in business & employment matters
22. Fiduciary duties& responsibilities
23. Wrongful termination
24. failure of duty to protect
25. New York City and State Human Rights Laws
26. Did deprive the plaintiffs of their property interest in violation of their Civil Rights
27. Wrongfully Interferes in Personal relationships
28. NYS Wrongful death statue
29. Malicious prosecution
30. American with Disability Act
31. It is Alleged that the defendants in all of the Acts listed in this complaint, did conspire with other name defendants to violate all of the individual acts listed
32. violate Unjust Enrichment
33. negligent supervision& hiring of employee
34. Made Terrorist threats
35. assault & battery
36. vandalism & Theft& burglary
37. various City, State Federal Civil Statues
38. federal, State and City Criminal Statues
39. residential rent overcharge
40. Code of Professional Ethics of New York State Bar Association and New York State Medical
41. It is alleged that the defendants did commit false imprisonment

The Relief Sought: Reimbursement of financial loss, restitution, monetary damage, injury to reputation

Value and Assessment of the loss of property, Damages for loss of property interest in workmen compensation and legal cases as a result of defendant's actions., Damages for loss of income and business past, present and future, Damages for Loss of consortium and services, damages for Emotional distress, Damages for all of the Causes of actions listed, Professional Sanctions and Judicial Relief, Declaratory Injunctive Relief with respect to the Defendant's Businesses, Restoration of Good name and reputation – business,employment,health, Damages for Emotional distress, Punative Damages, compensatory damages, Damages for emotional distress

Upon your failure to appear, judgment will be taken against you by default for the sum of \$250,000,000

Two hundred and fifty Million dollars with interest from February 25, 2011 and the Cost of this action.